

1 MICHAEL L. BECKER, ESQ.
2 Nevada Bar No. 8765
3 MICHAEL V. CASTILLO, ESQ.
4 Nevada Bar No. 11531
5 LAS VEGAS DEFENSE GROUP, LLC
6 2970 W. Sahara Avenue
7 Las Vegas, NV 89102
8 (702) 331-2725- Telephone
9 Attorneys for Defendant

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
UNITED STATES DISTRICT COURT
DISTRICT COURT OF NEVADA

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) CASE NO. 2:17CR00048
12 vs.)
13) STIPULATION TO CONTINUE
14 TIFANY TORRES) SENTENCING HEARING
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)
Defendant.)

Defendant, Tifany Torres, by and through her attorneys of record, MICHAEL V. CASTILLO, ESQ., and the United States of America, by and through United States Attorney Dayle Elieson, and Assistant United States Attorney Dan Cowhig, stipulate and request that the Court continue her sentencing hearing, currently scheduled January 22, 2019 at 9:00 a.m. be continued for One (1) month or at a date convenient for the Court. Defense is requesting for additional time to present mitigation evidence and finalize the sentencing memorandum. The defendant's plea agreement includes cooperation provisions. Moreover, the Defendant will need additional time to make travel arrangements. The instant case is related to USA v. Daniel Boyar et al., 2:17-cr-21-JCM-GQF.

1 Accordingly, in the view of the Government and the Defendant, this case is not ripe for
2 sentencing. Defendant Torres is not in custody, and specifically requests this continuance.
3 Defendant Torres is in compliance with her release conditions. Defendant Torres waives any right
4 she may have to a speedy sentencing in this matter.

5 WHEREFORE, the parties stipulate and request that the Court continue defendant Torres's
6 sentencing hearing, currently scheduled for January 22, 2019 at 9:00 a.m. be continued for One
7 (1) month or to a date convenient for the Court.

8 RESPECTFULLY SUBMITTED this 17th day of January, 2019.
9

10 /s/ Daniel J. Cowhig, Esq.
11 Daniel J. Cowhig
12 Assistant United States Attorney
13

14 /s/ Michael V. Castillo, Esq
15 MICHAEL V. CASTILLO, ESQ.
16 Nevada Bar No. 11531
17 Attorney for Tiffany Torres
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
DISTRICT COURT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
TIFANY TORRES,
Defendant.

CASE NO. 2:17CR00048

ORDER CONTINUING SENTENCING
HEARING

TIFANY TORRES,

Defendant.

This matter comes before the Court on the parties Stipulation to Continue Sentencing.

Based upon the stipulation of the parties, and good cause appearing therefore, the Court hereby finds that:

1. Defense is requesting for additional time to present mitigation evidence and complete the sentencing memorandum. In addition, the Defendant requires additional time to make travel arrangements. Accordingly, in the view of the government and the defendant, this case is not ripe for sentencing. Defendant Torres is not in custody and has no objection to a continuance of her sentencing hearing, currently scheduled for January 22, 2019 at 9:00 a.m. be continued for one (1) month or to a date convenient for the Court.

2. The Court hereby concludes that the ends of justice are best served by granting this continuance of defendant Torres' sentencing.

ORDER

IT IS THEREFORE ORDERED, that the sentencing currently scheduled for Tuesday January 22, 2019 at 9:00 a.m., be continued to the 26th day of February at 9:00 a.m., in Courtroom 4A.

IT IS SO ORDERED this 18th day of January, 2019.

Kenya

UNITED STATES DISTRICT COURT JUDGE
KENT J. DAWSON